

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	Case No.: 4:16-cr-528 - 2 AGF
)	
BLAKE LAUBINGER,)	
)	
Defendant.)	

SECOND MOTION TO CONTINUE SENTENCING

COMES NOW Defendant, Blake Laubinger, by and through counsel, and hereby moves this Court to continue the sentencing hearing scheduled for February 15, 2018 by a period of three (3) weeks. In support of this motion, Defendant states as follows:

1. Defendant plead guilty on November 3, 2017.
2. Defendant is presently scheduled to be sentenced on February 15, 2018.
3. Defendant testified last week at the hearing of co-defendant Todd Beckman.
Prior to that hearing, counsel was provided with additional reports that will be used in the preparation of a memorandum to be filed with the Court.
4. Additionally, Mr. Rosenblum is out of town this week and will be unable to appear at Defendant's hearing. Defendant wishes to have Mr. Rosenblum present at his sentencing.
5. Defendant, through counsel, has spoken with Assistant United States Attorney, John Davis. Mr. Davis has no objection to Defendant's request.

WHEREFORE, Defendant respectfully requests this Honorable Court continue the sentencing hearing presently scheduled for February 15, 2018 by a period of three (3) weeks..

Respectfully submitted,

ROSENBLUM, SCHWARTZ & FRY, PC

By: /S/ Marc Johnson
MARC JOHNSON, #58065 MO
Attorney for Defendant
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CERTIFICATE OF SERVICE

I hereby certify that on February 12, 2018, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Mr. John Davis, assistant United States attorney.